

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA**

ROBERT . KOFFLER,

Plaintiff,

v.

LERA INVESTMENT TECHNOLOGIES, INC.,

Defendant.

Case No. 1:24-cv-24563-RKA

**DEFENDANT’S UNOPPOSED MOTION FOR AN EXTENSION
OF TIME TO ANSWER OR RESPOND TO COMPLAINT¹**

Defendant Lera Investment Technologies, Inc. (“Defendant”) hereby moves for an extension through and including January 2, 2025, for Defendant to answer or respond to Plaintiff’s Complaint (ECF No. 1). As grounds for this motion, Defendant states as follows:

1. Plaintiff filed his Complaint in this matter on November 19, 2024 (ECF No. 1) and purportedly served Defendant on November 21, 2024.
2. The undersigned was retained by Defendant yesterday and needs additional time to respond to the Complaint for the following reasons:
 - a. *First*, the undersigned was retained by Defendant yesterday.
 - b. *Second*, the undersigned is in need of time to comprehensively analyze the eleven-page complaint and prepare a substantive response to the allegations.
3. Based on these circumstances, Defendant seeks (and Plaintiff’s counsel does not oppose), an extension through and including January 2, 2025 for Defendant to answer or respond

¹ By filing this Motion, Defendant does not waive any rights, defenses, arguments, or privileges with respect to the Complaint or otherwise, including but not limited to the right to assert any applicable contractual or extra-contractual provisions or obligations that may exist between the parties (*e.g.*, arbitration clauses or class action waivers).

to Plaintiff's Complaint.

4. The undersigned recognizes that the requested extension is longer than those typically granted by this Court, but given that undersigned was just retained and the upcoming holiday season, the undersigned respectfully asks the Court to recognize the unusual circumstances warrant the extended relief sought herein.

5. This request is made in good faith and for the purpose of judicial economy, not for the purpose of delay, and it will not prejudice any other party to this action. This motion is also being made prior to the expiration of the deadline to respond to the Complaint.

6. A proposed order is attached as required by Local Rule 7.1(a)(2).

7. Local Rule 7.1(a)(2) Certification: The undersigned certifies that Plaintiff's counsel, Leoncio E. de la Peña indicated that he agrees to an extension up to and including January 2, 2025.

WHEREFORE, Defendant respectfully requests that this Court enter an order extending the deadline for it to respond to the Complaint through and including January 2, 2025.

Dated: December 10, 2024

Respectfully submitted,

MARK MIGDAL & HAYDEN
80 S.W. 8th Street, Suite 1999
Miami, Florida 33130

By: *s/ Maia Aron*
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CERTIFICATE OF SERVICE

I hereby certify that I filed the foregoing document (including any attached exhibits and documents) electronically on the Court's CM/ECF docket on December 10, 2024, which served same electronically upon all counsel of record.

By: s/ Maia Aron
Maia Aron, Esq.